

BB-5

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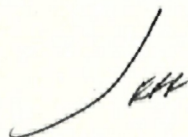
TOPS--FORM 3224 LITHO IN U.S.A.

**VERBAL ORDERS DON'T GO**

"SAY IT IN WRITING"

Date 10/20 19 80

Rilt - Browning Ferris moved 63 drums of non-hazardous St. John's  
wastes into landfill on 10/3/80. 4 hazardous drums  
remain on-site.

A handwritten signature, possibly "JRH", written in dark ink.

USEPA SF



1452348



U.S. ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 SIXTH AVENUE  
SEATTLE, WASHINGTON 98101

AUG 08 1986

REPLY TO  
ATTN OF: M/S 525

Rich Fullner  
Ecology and Environment  
108 S. Washington St.  
Suite 302  
Seattle, Washington 98104

Dear Mr. Fullner:

This letter is in regard to the Technical Directive Document tasking Ecology and Environment (E&E) to dispose of the drums of investigation-derived materials at St. Johns Landfill, Portland, Oregon. EPA has determined that the drums of waste from drilling Well O may contain hazardous waste. Please arrange for disposal of those drums at a hazardous waste landfill. The other drums do not contain hazardous materials and may be disposed of in a municipal landfill. You should work directly with Dennis O'Neil of the Metropolitan Service District of Portland to arrange for disposal of those non-hazardous drums at St. Johns Landfill.

Please keep me apprised of progress on these matters. Thank you.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lori Cohen".

Lori Cohen  
Site Manager

cc: John Osborn, ESD



# METRO

2000 S.W. First Avenue  
Portland, OR 97201-5398  
503/221-1646

Jeff Vilnow  
Ecology and Environment, Inc.  
108 South Washington St.  
Suite 302  
Seattle, WA 98104

## Metro Council

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Presiding Officer  
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Dear Mr. Vilnow:

I bring to your attention the drums of drill cuttings and other waste from your August 1985 investigation which are still stored on St. Johns Landfill. Now that the investigation is apparently completed, these drums must be properly disposed of as soon as possible. If the waste cannot be defined as a hazardous waste under federal or Oregon regulations, please so state when filling out the enclosed applications to dispose of special waste.

Sincerely,

Dennis O'Neil  
Senior Analyst  
Solid Waste Department

DO/epv

Encl.



## ecology and environment, inc.

108 SOUTH WASHINGTON, SUITE 302, SEATTLE, WASHINGTON 98104, TEL. 206-624-9537

International Specialists in the Environmental Sciences

September 8, 1986

Mr. Dennis O'Neil  
Metropolitan Service District  
2000 S.W. 1st Avenue  
Portland, OR 97201-5398

Dear Mr. O'Neil:

Enclosed please find the completed application to dispose of special wastes in St. John's Landfill. The wastes include 63 drums of refuse and miscellaneous disposable equipment generated during the Ecology and Environment, Inc. (E&E) investigation at St. John's in 1985. The wastes have been classified as non-hazardous by EPA (see attached letter from Lori Cohen, EPA Region X, Superfund Project Officer to Rich Fullner, E&E, Assistant Regional Manager, dated August 8, 1986), based on analytical test results. Four additional drums, generated during construction of "Well O," are classified as hazardous and will be disposed of in a hazardous waste landfill.

Approved waste haulers in the Portland area have been contacted. Final arrangements to transport and dispose of the drums are forthcoming, pending acceptance of the enclosed application. If you have any questions regarding this matter, please phone at (206) 624-9537.

Sincerely,

Jeff Villnow  
Project Manager

JV/ng

Enclosure

R. Fullner



## ecology and environment, inc.

108 SOUTH WASHINGTON, SUITE 302, SEATTLE, WASHINGTON 98104, TEL. 206-624-9537

International Specialists in the Environmental Sciences

### M E M O R A N D U M

DATE: September 30, 1986

TO: J. Osborn, FIT RPO, USEPA, Region X

THRU: D. Buecker, FIT RPM, E&E, Seattle *Quib*

FROM: J. Villnow, Project Manager, E&E, Seattle *N*

SUBJ: Drum Disposal - St. John's Landfill  
Portland, Oregon

REF: TDD R10-8608-01

CC: L. Cohen, USEPA, Region X

The following documents E&E's efforts to arrange for the disposal of drummed drill cuttings at St. John's Landfill in Portland, Oregon:

- o August 8, 1986. Received letter from EPA requesting disposal of drums at St. John's. Four drums classified potentially hazardous.
- o Sept. 8, 1986. METRO application to dispose of Special Wastes sent to Dennis O'Neil, METRO, from R. Fullner, E&E, Seattle.
- o Sept. 9, 1986. Contacted Crosby and Overton in Portland to obtain a quote for moving 63 non-hazardous drums to the active landfill area. Quoted price was \$770.00. Contacted CSSI, Arlington, Oregon, to arrange disposal of four hazardous drums. CSSI would not accept the four drums in that the wastes are considered putrescible. Contacted U.S. Ecology, Beattie, Nevada, for disposal quote.
- o Sept. 16, 1986. Application approved by Dennis O'Neil for 63 drums of drilling waste to be disposed of in St. John's. Four other drums, designated 0-1, 2, 3, 4, were not accepted and must be disposed of in a hazardous waste landfill. The approved application also states that METRO will not charge a disposal fee for the 63 drums.
- o Sept. 16, 1986. At Dennis O'Neil's suggestion, I contacted Mr. John Bailey of Browning, Ferris, Inc. (BFI), the current operators of St. John's, to obtain a quote for moving the drums to the active portion of the landfill.

St. John's Landfill  
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- o Sept. 18, 1986. U.S. Ecology informed E&E that they could not accept drums of biodegradable wastes. Did not know of a landfill that could, suggested contacting incinerators.
- o Sept. 25, 1986. BFI quote of \$496.00 received. Requested an E&E purchase order for \$496.00 to BFI to move 63 drums.
- o Sept. 30, 1986. Louis Craig, E&E, Seattle, to travel to Portland and secure the four hazardous drums for BFI (to prevent inadvertant disposal). Archived St. John's samples from E&E's warehouse, excluding those from Boring O, will be placed in the drums of non-hazardous materials and disposed of by BFI.
- o Sept. 30, 1986. Contacted SCA incinerator in Chicago, Illinois. Referred by SCA to Ashland Chemical Company in Oregon. Ashland handles small orders for SCA's sister incinerator in Cauget, Illinois. Ashland Chemical will send waste profile sheet. Disposal by incineration will require collection of a single composite sample from the drums, analysis for various metals, verification of results by Ashland (\$275.00 fee), and approval from incinerator in Cauget. Minimum time for processing paper work at Ashland is four to six weeks. Spending/travel freeze during extended E&E contract with EPA prevents further action by E&E with Ashland and/or Cauget incinerator.
- o Disposal of the 63 non-hazardous drums at St. John's should occur by October 3, 1986. It does not appear that the four hazardous drums can be moved by METRO's October 15, 1986 deadline.